

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**
No. 1:23-md-3076-KMM

In re

*FTX Cryptocurrency Exchange Collapse
Litigation*

This Document Relates to the Administrative
Class Action Complaint and Demand for Jury
Trial as to the Bank Defendants (ECF No. 155)

**DECLARATION OF LARA SAMET BUCHWALD IN SUPPORT OF DEFENDANTS
DELTEC BANK AND TRUST COMPANY LIMITED AND JEAN CHALOPIN'S
OPPOSITION TO PLAINTIFFS' OMNIBUS MOTION TO LIFT THE DISCOVERY
STAY, CONDUCT JURISDICTIONAL DISCOVERY,
AND AMEND THEIR COMPLAINTS**

I, Lara Samet Buchwald, declare as follows:

1. I am a partner of the law firm Davis Polk & Wardwell LLP, counsel to Defendants Deltec Bank and Trust Company Limited and Jean Chalopin, and I have filed a Certificate of Understanding in the above-captioned matter. I have personal knowledge of the matters set forth in this Declaration.
2. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' First Set of Requests for Production to Defendant Deltec Bank & Trust Company, Limited, dated August 2, 2023.
3. Attached as Exhibit 2 is a true and correct copy of a redline comparison between two documents: (a) Plaintiffs' First Set of Requests for Production to Defendant Deltec Bank & Trust Company, Limited, dated August 2, 2023; and (b) Plaintiffs' First Set of Requests for Production of Documents to Defendant Deltec Bank and Trust Company Limited, included as

Exhibit D to Plaintiffs' Omnibus Motion to Lift the Discovery Stay, Conduct Jurisdictional Discovery, and Amend Their Complaints (ECF No. 348-5 at 2-25).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 17, 2023, at New York, New York.

/s/ Lara Samet Buchwald
Lara Samet Buchwald